UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA
INSTITUTE OF TECHNOLOGY, UNIVERSITY
OF CHICAGO, THE TRUSTEES OF COLUMBIA
UNIVERSITY IN THE CITY OF NEW YORK,
CORNELL UNIVERSITY, TRUSTEES OF
DARTMOUTH COLLEGE, DUKE UNIVERSITY,
EMORY UNIVERSITY, GEORGETOWN
UNIVERSITY, THE JOHNS HOPKINS
UNIVERSITY, MASSACHUSETTS INSTITUTE
OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME
DU LAC, THE TRUSTEES OF THE
UNIVERSITY OF PENNSYLVANIA, WILLIAM
MARSH RICE UNIVERSITY, VANDERBILT
UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No.: 1:22-cv-00125

Hon. Matthew F. Kennelly

UNOPPOSED MOTION BY PLAINTIFFS FOR AN ENLARGEMENT OF THE PAGE LIMIT FOR PLAINTIFFS' MEMORANDUM OF LAW

Pursuant to Northern District of Illinois Local Rule 7.1, Plaintiffs respectfully seek leave to file a Memorandum of Law ("Memorandum") that exceeds 15 pages in length (totaling no more than 33 pages) in support of their Motion regarding Provisional Certification of Settlement

Class, Preliminary Approval of Proposed Partial Settlement, Approval of the Form and Manner of Notice to the Class, and Proposed Schedule for a Fairness Hearing.

- 1. This is a proposed class action alleging that seventeen elite universities violated the antitrust laws by agreeing on a common formula and common principles regarding financial aid, and by exchanging competitively sensitive information concerning financial aid principles, formulas, and pricing.
- 2. On September 9, 2023, the Court issued an Order preliminarily approving the settlement between the plaintiff Class and defendant University of Chicago, certifying the Class for purposes of settlement, and setting forth a schedule for the remainder of the approval process. See ECF 439 (the "Chicago Order").
- 3. On November 28, 2023, the Court granted Plaintiffs' unopposed motion, see ECF 526, seeking to suspend all of the deadlines in the Chicago Order until Plaintiffs filed a motion setting forth a new proposed schedule for the approval process consistent with the discussion in the November 22, 2023 Joint Status Report. ECF 530. Plaintiffs' motion is due January 23, 2024. ECF 588.
- 4. Plaintiffs respectfully seek leave of the Court to file a Memorandum in excess of 15 pages to address the standards for provisional certification of a settlement class, preliminary approval of a proposed partial settlement, and approval of the form and manner of class notice.
- 5. Plaintiffs' counsel conferred with Defendants' counsel, who did not express opposition to this request.
- 6. The Court previously granted a similar request for excess pages prior to Plaintiffs' filing of their August 14, 2023 Motion for Provisional Certification of Settlement Class,

Preliminary Approval of Proposed Partial Settlement, Approval of the Form and Manner of Notice to the Class, and Proposed Schedule for a Fairness Hearing. ECF 429.

WHEREFORE, for the reasons stated above, Plaintiffs respectfully request that the Court grant this Motion and permit Plaintiffs to file a Memorandum totaling no more than 33 pages in length.

Dated: January 22, 2024

By:/s/Robert D. Gilbert

Robert D. Gilbert Elpidio Villarreal Robert S. Raymar David Copeland Steven Magnusson Natasha Zaslove

GILBERT LITIGATORS & COUNSELORS, P.C.

11 Broadway, Suite 615 New York, NY 10004 Phone: (646) 448-5269 rgilbert@gilbertlitigators.com pdvillarreal@gilbertlitigators.com rraymar@gilbertlitigators.com dcopeland@gilbertlitigators.com smagnusson@gilbertlitigators.com nzaslove@gilbertlitigators.com

/s/ Eric Cramer

Eric L. Cramer Ellen Noteware David A. Langer

BERGER MONTAGUE PC

1818 Market Street, Suite 3600 Philadelphia, PA 19103 Tel: 215-875-3000 ecramer@bm.net enoteware@bm.net dlanger@bm.net Respectfully Submitted,

/s/ Edward J. Normand

Devin "Vel" Freedman Edward J. Normand Peter Bach-y-Rita Richard Cipolla

FREEDMAN NORMAND FRIEDLAND LLP

99 Park Avenue Suite 1910 New York, NY 10016 Tel: 646-970-7513 vel@fnf.law tnormand@fnf.law pbachyrita@fnf.law rcipolla@fnf.law

Daniel J. Walker Robert E. Litan Hope Brinn

BERGER MONTAGUE PC

2001 Pennsylvania Avenue, NW Suite 300

Washington, DC 20006 Tel: 202-559-9745 rlitan@bm.net

dwalker@bm.net hbrinn@bm.net Richard Schwartz **BERGER MONTAGUE PC**1720 W Division
Chicago, IL 60622
Tel: 773-257-0255
rschwartz@bm.net

Counsel for Plaintiffs and the Proposed Class